



U.S. Department of Justice

*United States Attorney
District of New Jersey**Brian L. Urbano
Assistant United States Attorney**970 Broad Street, Suite 700
Newark, NJ 07102**(973) 645-2700
DIRECT DIAL (973) 297-2078
FAX (973) 297-2094*

April 13, 2010

VIA FACSIMILE AND REGULAR MAIL

Hon. Peter G. Sheridan
Clarkson S. Fisher Federal Building & Courthouse
402 East State Street
Trenton, NJ 08608

*As Ordered
Peter H. Schumacher
4/15/10*

Re: United States v. Gadiel Gonzalez

Dear Judge Sheridan:

CR. 10-12 (PGS)

Please accept this letter brief in lieu of a more formal submission requesting an extension of time to respond to Defendant Gadiel Gonzalez's omnibus motion to suppress in the above captioned case.

On April 5, 2010, defense counsel contacted the government to notify it that the defendant would be filing a motion the following day. At that time, I requested an extension to respond to Defendant's omnibus motion as I was expected to begin a trial before Judge Martini on April 13, 2010. Defense counsel consented to an extension. On April 6, 2006, Defendant filed his omnibus motion, which seeks relief on several grounds, including the suppression of ecstasy pills seized from his home.

The government respectfully requests a 30 day extension to respond to the motion for the following reasons:

First, the Government's case previously scheduled to begin on April 13, 2010 has been postponed by the Court to April 27, 2010. The trial is expected to last one week. As a result, I will be involved in significant preparation and attending trial proceedings for the next 3 weeks without the time necessary to devote to responding to Defendant's motion.

Second, Defendant's omnibus motion includes the several grounds for relief. Most

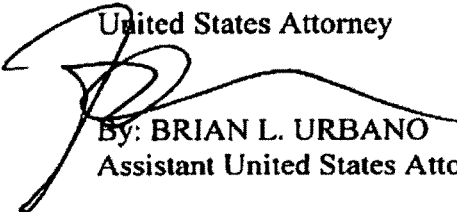
importantly, Defendant's argument concerning whether state parole officers were permitted to conduct any search of the Defendant's property raises a unique issue. As such, the government needs additional time to research, review and respond to this issue.

Third, on April 12, 2010, defense counsel stated that he had no objection to a 30 day extension to respond.

For the foregoing reasons, the government respectfully requests that the Court grant a 30 day extension to its time to respond to Defendant's omnibus motion.

Very truly yours,

PAUL J. FISHMAN
United States Attorney



By: BRIAN L. URBANO
Assistant United States Attorney

cc: Patrick McMahon, AFPD